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Attorney for Debtor(s)
 LEONID BANAR
 LYUDMILA BANAR

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA

In re: Case No.: 19-21860-C-13C
 LEONID BANAR & In Chapter 13
 LYUDMILA BANAR, Mtn. Ctrl. No. MS-1

**MOTION TO VALUE
 COLLATERAL OF FCI LENDER
 SERVICES, INC.**

Date: April 16, 2019
 Time: 2:00 P.M.
 Ctrm: 33
 Dept: C

Debtor(s).

MOTION

LEONID BANAR and LYUDMILA BANAR, the debtors and petitioners
 herein, hereby move this Court for an Order Valuing the Collateral held
 by FCI LENDER SERVICES, INC. In Support of this Motion, the Debtors
 respectfully represent:

1. The Petitioners are the Debtors in Chapter 13 in the above-
 captioned bankruptcy case, having filed their petition for relief on

1 March 26, 2019. David Cusick has been duly appointed to serve as the
2 Chapter 13 Trustee on this case.

3 2. No claim has been filed to date in this case on behalf of FCI
4 LENDER SERVICES, INC.

5 3. This motion is brought pursuant to 11 U.S.C. §506(a) and (d)
6 and Rule 3012 of the Federal Bankruptcy Procedures.

7 4. The Schedules filed in this case disclose the Debtors'
8 interest in the real property located at 8219 Villaview Drive Citrus
9 Heights, CA 95621 (hereinafter, the "ASSET"). Based on the condition
10 of the home, in today's market, the Debtors believe and assert that the
11 reasonable, fair-market value of the ASSET is \$255,000.00.
12

13 5. The Schedules filed in this case also disclose a debt owed to
14 FCI LENDER SERVICES, INC.

15 6. The Debtors believe and assert that this creditor holds a
16 valid security interest in the ASSET in the nature of a Second Deed of
17 Trust.
18

19 7. The Debtors further believe and assert that the present
20 balance owed by the Debtors to this creditor is \$98,406.73.
21

22 8. As also shown in Schedule D of the filed case, there is a
23 creditor that holds a superior interest in the ASSET. Specifically,
24 Nationstar Mortgage, LLC holds a superior secured claim totaling
25 \$258,803.15.

26 9. The Value of the ASSET in the amount of \$255,000.00 minus the
27 superior lien of Caliber Home Loans in the amount of \$258,803.15 is
28 -\$3,803.15.

1 10. Based on the foregoing and the Declaration filed herewith,
2 the Debtor asserts that the value of the security interest held by FCI
3 LENDER SERVICES, INC. is \$0.00.

4 WHEREFORE, Debtors and Petitioners herein respectfully request the
5 Court to determine that the value of the security interest, as held by
6 FCI LENDER SERVICES, INC., in the ASSET be set at \$0.00.
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9 Dated: March 26, 2019

Respectfully Submitted:

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11 By: /s/ Mark Shmorgon
12 Mark Shmorgon, Esq.
13 Law Offices of Mark Shmorgon
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